


CRIMINAL COMPLAINT  
(Electronically Submitted)

<b>United States District Court</b>	DISTRICT of ARIZONA
<b>United States of America</b> v. <b>Edwin Alexey GAMBOA</b> DOB: 2003; United States Citizen	DOCKET NO.  MAGISTRATE'S CASE NO. <b>24-04278MJ</b>
Complaint for violation of Title 18, United States Code, § 554(a)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> On or about February 4, 2024, in the District of Arizona, <b>Edwin Alexey GAMBOA</b> knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: ten (10) AK-47 style rifle magazines and one (1) Glock magazine, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> <p>On February 4, 2024, <b>Edwin Alexey GAMBOA</b> attempted to exit the United States and enter the Republic of Mexico through the Lukeville Port of Entry in Lukeville, Arizona. <b>Edwin Alexey GAMBOA</b> was the driver and sole occupant of a of a White Jeep Grand Cherokee bearing Nevada license plate 476W48. A Customs and Border Protection Officer (CBPO) conducted an outbound inspection on <b>GAMBOA</b> and the vehicle. <b>GAMBOA</b> told the CBPO that he was travelling from Ajo, Arizona to Sonoyta, Sonora, Mexico. The CBPO asked <b>GAMBOA</b> if there were any firearms or ammunition in the vehicle, to which <b>GAMBOA</b> replied "no". The CBPO observed that <b>GAMBOA's</b> hands were shaking throughout their exchange. <b>GAMBOA</b> and the vehicle were then referred to secondary inspection for additional inspection.</p> <p>During secondary inspection, CBPO's discovered a plastic bag containing two (2) AK-47 style rifle magazines concealed in a natural void on the passenger side windshield cowling. CBPO's then discovered six (6) AK-47 style rifle magazines concealed in the driver's side windshield cowling, two (2) AK-47 style rifle magazines in the engine filter box, and one (1) Glock magazine under a plastic engine cover. A total of ten (10) AK-47 style rifle magazines and one (1) Glock magazine were discovered concealed in the vehicle.</p> <p>The magazines found in the vehicle <b>GAMBOA</b> was driving qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.  AUTHORIZED BY AUSA <i>R. Arellano</i> <u>RAQUEL ARELLANO</u> <small>Digitally signed by RAQUEL ARELLANO Date: 2024.02.05 13:18:41 -07'00'</small>	SIGNATURE OF COMPLAINANT MICHAEL R DANG <small>Digitally signed by MICHAEL R DANG Date: 2024.02.05 13:38:37 -07'00'</small>  OFFICIAL TITLE HSI SA Michael Dang
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> 	DATE February 5, 2024

1) See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54